

**CHARGE OF DISCRIMINATION
KAY JACKSON
PAGE 1**

I. Overview of Individual and Class Allegations

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Facts

I filed an employment application with AK Steel in Ashland, Kentucky three times: in 1999, 2001, and on approximately May 9, 2002. Each time, I applied to do general labor or clerical work. As my prior employment experience includes more than eighteen years of continuous work in a clerical capacity at Tenneco Packaging doing, among other things, shipping, order-taking, accounts payable and bookkeeping, I believed myself to be well qualified to fulfill either clerical or general labor responsibilities at AK Steel.

During each application process, I was called in to take a test. Each time, the test included questions on mechanical knowledge, reading comprehension, mathematics, and other material that seemed unrelated to one's ability to perform general labor, which usually involves tasks such as ditch digging. After I took the test in 1999, an AK Steel representative told me that I had failed it. The fact that another AK Steel hiring agent contacted me via phone subsequently, however, led me to believe that I had actually passed the test. During this phone conversation, the hiring agent posed personal questions like, "Why do you want to work at AK Steel?" but did not inquire into matters that seemed more relevant to my ability to perform the duties of the position I was applying for, such as my work experience or skills. A week later I received a letter informing me that I was "not needed at this time."

In 2001, I took the test again but was not informed whether I had passed it or not, was not contacted for an interview, and received no notification of rejection. Since taking the test for a third time on approximately May 9, 2002, I have heard nothing from AK Steel. When they contacted me in 1999, it was approximately one week after I took the test. I am currently doing Accounts Payable and Payroll for Shawnee Mental Health Center, where I have been employed for almost three years.

**CHARGE OF DISCRIMINATION
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PAGE 2**

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(c), et seq.

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 14, 2002

Kay L. Jackson

Charging Party (signature)